

RAVERT PLLC

Gary O. Ravert
16 Madison Square West, Fl 12, #269
New York, New York 10010
Tel: (646) 961-4770
Fax: (917) 677-5419

Special Litigation Counsel for Debtors and Debtors In Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

26 BOWERY LLC and
2 BOWERY HOLDING LLC,

Debtor In Possession.

)
)
) Chapter 11
)

) Case No.: 22-10412 (MG) and
) 22-10413 (MG)
) (Jointly Administered)
)
)
)

**FEE STATEMENT OF RAVERT PLLC FOR COMPENSATION FOR SERVICES
AND REIMBURSEMENT OF EXPENSES AS SPECIAL LITIGATION COUNSEL FOR
THE DEBTORS FOR THE PERIOD FROM SEPTEMBER 1, 2024 TO SEPTEMBER 30, 2024**

Name of Applicant:	Ravert PLLC
Retained to Provide Professional Services to:	26 Bowery LLC (“26 Bowery”) and 2 Bowery Holdings LLC (“2 Bowery”)
Date of Retention:	August 29, 2022 [ECF No. 93], Effective August 5, 2022
Period for Which Compensation and Expense Reimbursement is Sought:	September 1, 2024 through September 30, 2024
Amount of Compensation Sought as Actual, Reasonable and Necessary	26 Bowery: \$ 792.00 2 Bowery: \$ 612.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary	26 Bowery: \$ 0 2 Bowery: \$ 0

This statement is the fee statement (“Fee Statement”) of Ravert PLLC, special litigation counsel to 26 Bowery and 2 Bowery (together, “Debtors”) for September 1, 2024 through September 30, 2024, filed with this Court pursuant to the *Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses of Professionals* (ECF Doc. 67) (“Monthly Compensation Order”). Ravert PLLC hereby requests: (a) compensation as allowed by the Monthly Compensation Order in the amount of (i) \$792.00 from 26 Bowery and \$612.00 from 2 Bowery for the period of September 1, 2024 through September 30, 2024 (“Fee Period”); and (b) reimbursement of actual and necessary costs and expenses as allowed in the Monthly Compensation Order in the amount of (i) \$0 from 26 Bowery and (ii) \$0 from 2 Bowery incurred by Ravert PLLC during the Fee Period in connection with these cases for a total of \$1,404.00 in fees and \$0 in total expenses of which Ravert PLLC seeks actual payment of \$1,123.20 in aggregate fees (representing 80% of aggregate fees of \$1,404.00) and \$0 in aggregate expenses. Attached as Exhibits A and B hereto is for 26 Bowery and 2 Bowery, respectively and redacted as necessary, contemporaneously maintained time entries for each professional who provided services during the Fee Period in increments of tenths (1/10) of an hour, which includes an itemization and description of the costs and expenses incurred by Ravert PLLC during the Fee Period.

Division of Time

Where a discreet service is rendered for only one Debtor, that time is reflected in the time records of that specific Debtor. In many cases the services benefit each Debtor equally in which case the time is simply divided equally between the Debtors. A common example of this is strategy conferences, the joint pretrial conferences, single events like general trial prep affecting both Debtors equally, order and judgment entry, drafting letters that address occupants in both buildings and other similar communications which make up a significant portion of the services

rendered.

Further, included within this Fee Statement is a statement of the total time spent by individual professionals or paraprofessionals, setting forth the name of each individual who provided services during the Fee Period, their respective billing rates, and the aggregate hours expended by each individual.

Pursuant to Ravert PLLC's customary billing practices, professionals and paraprofessionals maintain records of their billed time for services rendered in connection with the Debtors' chapter 11 cases. Thereafter, the aggregate time billed by each professional or paraprofessional is multiplied by their respective billing rates. The disbursements consist of an itemized list all expenses actually incurred by Ravert PLLC in connection with its representation of the Debtors including for this period, including postage and delivery charges and other expenses incurred as a result of Ravert PLLC's representation of the Debtors. There may be disbursements that were incurred during the Fee Period that are not reflected in this Fee Statement or are out of sync with the time period of this Fee Statement, but will appear in another monthly fee statement because of timing of posting of disbursements, particularly those relating to third-party vendors.

Notice and Objection Deadline

Pursuant to the Monthly Compensation Order, Ravert PLLC has filed and served this Fee Statement by email delivery to: (a) counsel to the Debtors, Leech Tishman Robinson Brog PLLC, Attn: Fred B. Ringel, 875 Third Avenue, 9th Floor, New York, New York 10022; and overnight delivery to (b) counsel to Double Bowery Funding LLC, Morrison Cohen LLP, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Joseph T. Moldovan; and (c) the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, NY 10004-1408, Attn: Greg Zipes (collectively, (a)-(c) are referred to as "Notice

Parties”). The Notice Parties will have fourteen (14) days after receipt of a Monthly Fee Statement (“Objection Deadline”) to review the Fee Statements and, in the event that a Notice Party has an objection to the compensation or reimbursement sought in the Fee Statement, serve upon the Retained Professional whose statement is objected to and the Notice Parties, a written “Notice of Objection to Fee Statement” setting forth the nature of the objection and the amount of fees or expenses at issue. The Monthly Compensation Order provides that at the expiration of the Objection Deadline, the Debtors shall promptly pay 80% of the undisputed fees and 100% of the undisputed expenses identified in each Fee Statement to which no objection has been served in accordance with such Monthly Compensation Order. If an objection is filed, the Debtors shall not pay the fees and/or expenses to which the objection is directed, and the objection shall be resolved in accordance with such Monthly Compensation Order.

Timekeepers Related to This Fee Statement

26 Bowery:	GR – Gary O. Ravert:	2.2 Hours for a Total of	\$ 792.00
2 Bowery:	GR – Gary O. Ravert:	1.7 Hours for a Total of	\$ 612.00
	Total Hours/Fees	3.9 Hours	\$ 1,404.00

WHEREFORE, pursuant to the Monthly Compensation Order, Ravert PLLC requests payment of: \$1,404.00 in fees and \$0 in total expenses of which Ravert PLLC seeks actual payment of \$1,123.20 in aggregate fees (representing 80% of aggregate fees of \$1,404.00) and \$0 in aggregate expenses for a total payment of **\$1,123.20**.

RAVERT PLLC

Dated: November 19, 2024
New York, New York

/s/ Gary O. Ravert

By: /s/ Gary O. Ravert
16 Madison Square West, FL 12, #269
New York, New York 10010
Tel: (646) 961-4770
Fax: (917) 677-5419
gravert@ravertpllc.com

Special Litigation Counsel for the Debtors

EXHIBIT A



INVOICE
November 19, 2024

26 Bowery LLC
Brian Ryniker
c/o RK Consultants
156 Dubois Avenue
Sea Cliff, NY 11579

Services: In re 26 Bowery LLC, Chapter 11 Case No. 22-10412 (MG) and 2 Bowery Holding LLC, Chapter 11 Case No. 22-10413 (MG) (Jointly Administered)
Chapter 11 Proceedings and Related Issues: 9-1-24 through 9-30-24

26 Bowery Services

Project Category: Litigation

Timekeeper	Date	Description	Hours	Amount
GR	9/3/24	Telephone call with B. Ryniker regarding disposal of garbage from 26 Bowery, Fifth Floor and related topics (.7); prepare for and take part in telephone call with C. Yee regarding updating addresses and master service list (.1); communications with L. De Lotto about next steps in case (.1).	.9	\$324.00
GR	9/4/24	Review newly filed motion to shorten time and motion to approve bid procedures (.1).	.1	\$36.00
GR	9/8/24	Communications with C. Yee regarding disclosure statement (NOT BILLED).	0.0	\$0
GR	9/9/24	Review and revise latest draft of disclosure statement with particular regard to section regarding tenant litigation (.4); communications with C. Yee regarding same (.1).	.5	\$180.00

GR	9/10/24	Review newly filed plan and disclosure statement and motion to approve same (.2).	.2	\$72.00
GR	9/11/24	Communications with C. Yee regarding status and fee hearing appearance (NOT BILLED).	0.0	\$0
GR	9/12/24	Telephone call with L. De Lotto regarding tenancies and building issues (.1); prepare for and appear for bid procedures hearing and preliminary approval of disclosure statement (NOT BILLED).	.1	\$36.00
GR	9/13/24	Review newly entered order approving bid procedures and provisions therein including scheduling issues (.1).	.1	\$36.00
GR	9/17/23	Review order approving disclosure statement and as-filed plan (.1).	.1	\$36.00
GR	9/23/24	Review numerous communications from E. Spitzer and L. Noel regarding violations at properties and potential litigation regarding same (.1).	.1	\$36.00
GR	9/24/24	Review amended confirmation scheduling order (NOT BILLED); review numerous communications from and between E. Spitzer and L. Noel regarding OATH hearing and strategy regarding same (.1).	.1	\$36.00
Totals			GR: 2.2 Total: 2.2	\$792.00 \$792.00

Expenses: \$0.0

Expenses by Category:

<i>Nature of Expense</i>	<i>Amount</i>
Priority Mail Service Charges	\$ 0
Copy charges, binders, electronic media	\$ 0
Online legal research	\$ 0
Certified copies, recording fees, execution fees and supplies, filing fees	\$ 0
Deposition and Litigation and Other Travel	\$ 0

Process Server Charges, witness fees	\$ 0
<u>Deposition conference charges/transcripts</u>	<u>\$ 0</u>
Total	\$ 0

Unbilled Time: Including the unbilled time above, no less than 1.0 hours of unbilled.

Time per Project Category:

Litigation: GR – Gary O. Ravert: 2.2 Hours for a Total of \$792.00

Total Time Per Timekeeper:

Timekeeper: GR – Gary O. Ravert: 2.2 Hours for a Total of \$792.00

BILL SUMMARY

Total Fees: \$ 792.00

Total Expenses: \$ 0

Grand Total: \$ 792.00

Less Retainer: (0.00)

Amount Due: \$ 792.00

Payment Info: Please make payment via or wire, Zelle, or ACH. Specific payment instructions to be provided by separate communication.

EXHIBIT B



INVOICE
November 19, 2024

2 Bowery Holding LLC
Brian Ryniker
c/o RK Consultants
156 Dubois Avenue
Sea Cliff, NY 11579

Services: In re 26 Bowery LLC, Chapter 11 Case No. 22-10412 (MG) and 2 Bowery Holding LLC, Chapter 11 Case No. 22-10413 (MG) (Jointly Administered)
Chapter 11 Proceedings and Related Issues: 9-1-24 through 9-30-24

2 Bowery Services

Project Category: Litigation

Timekeeper	Date	Description	Hours	Amount
GR	9/3/24	Prepare for and take part in telephone call with C. Yee regarding updating addresses and master service list (.2); communications with L. De Lotto about next steps in case (NOT BILLED).	.2	\$72.00
GR	9/4/24	Review newly filed motion to shorten time and motion to approve bid procedures (.1).	.1	\$36.00
GR	9/8/24	Communications with C. Yee regarding disclosure statement (.1).	.1	\$36.00
GR	9/9/24	Review and revise latest draft of disclosure statement with particular regard to section regarding tenant litigation (.5); communications with C. Yee regarding same (NOT BILLED).	.5	\$180.00
GR	9/10/24	Review newly filed plan and disclosure statement and motion to	.2	\$72.00

		approve same (.2).		
GR	9/11/24	Communications with C. Yee regarding status and fee hearing appearance (.1).	.1	\$36.00
GR	9/12/24	Telephone call with L. De Lotto regarding tenancies and building issues (NOT BILLED); prepare for and appear for bid procedures hearing and preliminary approval of disclosure statement (.1).	.1	\$36.00
GR	9/13/24	Review newly entered order approving bid procedures and provisions therein including scheduling issues (.1).	.1	\$36.00
GR	9/17/24	Review order approving disclosure statement and as-filed plan (NOT BILLED).	0.0	\$0
GR	9/23/24	Review numerous communications from E. Spitzer and L. Noel regarding violations at properties and potential litigation regarding same (.1).	.1	\$36.00
GR	9/24/24	Review amended confirmation scheduling order (.1); review numerous communications from and between E. Spitzer and L. Noel regarding OATH hearing and strategy regarding same (.1).	.2	\$72.00
Totals			GR: 1.7 Total: 1.7	\$612.00 \$612.00

Expenses: \$0

Expenses by Category:

<i>Nature of Expense</i>	<i>Amount</i>
Priority Mail Service Charges	\$0
Copy charges, binders, electronic media	\$0
Online legal research	\$0
Certified copies, recording fees, execution fees and supplies, filing fees	\$0
Deposition and Litigation Travel	\$0

Process Server Charges, witness fees	\$0
<u>Deposition conference charges/transcripts</u>	<u>\$0</u>
Total	\$0

Unbilled hours: Including the unbilled time above, no less than .5 hours of unbilled time

Time per Project Category:

Litigation: GR – Gary O. Ravert: 1.7 Hours for a Total of \$ 612.00

Total Time Per Timekeeper:

Timekeeper: GR – Gary O. Ravert: 1.7 Hours for a Total of \$ 612.00

BILL SUMMARY

Total Fees:	\$ 612.00
Total Expenses:	<u>\$ 0</u>
Grand Total:	\$ 612.00
Less Retainer:	(0.00)
Amount Due:	\$ 612.00

Payment Info: Please make payment via or wire, Zelle, or ACH. Specific payment instructions to be provided by separate communication.